

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**In re:
Eric Jensen,**

Debtor.

**Case No. 23-10201-BFK
Chapter 7**

**NOTICE OF TRUSTEE'S MOTION TO APPROVE COMPROMISE
AND SETTLEMENT OF TRUSTEE'S AVOIDANCE CLAIMS AGAINST DENA JENSEN**

PLEASE TAKE NOTICE that Janet M. Meiburger, the duly appointed, qualified and acting Chapter 7 Trustee herein for Eric Jensen (the "Debtor"), by counsel, has filed papers (specifically that certain *Motion To Approve Compromise And Settlement Of Trustee's Avoidance Claims Against Dena Jensen* (the "Motion")) requesting entry of an Order approving the Trustee's proposed compromise and settlement with respect to certain avoidance claims asserted in an adversary proceeding (AP No. 24-01055-BFK) (the "Adversary Proceeding") filed against Dena Jensen ("Mrs. Jensen"), the Debtor's wife, asserting avoidance claims under the provisions of 11 U.S.C. §§548(a) and 550(a)(1) in the amount of \$92,927.81 (the "Avoidance Claims"). Under the terms of the settlement agreement, Mrs. Jensen will pay the Trustee the sum of \$55,000 to resolve the Avoidance Claims, the parties will mutually release one another, and the pending Adversary Proceeding will be dismissed with prejudice. A copy of the *Motion* and a proposed *Order* may be viewed at the Bankruptcy Court's website (<http://www.vaeb.uscourts.gov/>) or may be obtained by written request to the undersigned counsel.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not wish the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then on or before March 6, 2025 (the "Response Deadline"), which is twenty-one (21) days after the date of service of this Notice, you or your attorney must:

- File with the Court, at the following address, Clerk of Court, United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 South Washington Street, Alexandria, Virginia 22314, a written response with supporting Memorandum, as required by Local Rule 9013-1(G). **UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THE MOTION AND A SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN 21 DAYS OF THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED, AND TREAT THE MOTION AS CONCEDED AND ISSUE AN ORDER GRANTING THE REQUESTED RELIEF WITHOUT FURTHER NOTICE OR HEARING.** If you mail your response to the Court for filing, you must mail it early enough so the court will receive it on or before the date noted above. You must also mail a copy to the persons listed below.

Robert M. Marino, Esq. VSB #26076
Redmon Peyton & Braswell, LLP
510 King Street, Suite 301
Alexandria, VA 22314
703-879-2676 (Direct)
703-684-5109 (fax)
rmmarino@rpb-law.com
Counsel for Janet M. Meiburger, Trustee

◇ **Send a copy of any written response to the following persons:**

Robert M. Marino, Esq. Redmon Peyton & Braswell LLP 510 King Street, Suite 301 Alexandria, Virginia 22314	The Office of the United States Trustee, Region 4 1725 Duke Street, Suite 650 Alexandria, VA 22314
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If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the *Motion* and may enter an order granting that relief.

Dated: February 13, 2025

Respectfully Submitted,

/s/ Robert M. Marino

Robert M. Marino, Esq. VSB#26076
REDMON, PEYTON & BRASWELL, LLP
510 King Street, Suite 301
Alexandria, VA 22314
Phone: 703-684-2000
Fax: 703-684-5109
Email: rmmarino@rpb-law.com
Counsel for Janet M. Meiburger, Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of February, 2025, caused a copy of the foregoing *Notice* to be served electronically through the electronic case filing system to all persons entering their appearance and requesting notice in this case and to the following persons:

Daniel M. Press, Esq.
Chung & Press, P.C.
Counsel for Defendant Dena Jensen
Email: dpress@chung-press.com

and by first class mail, postage prepaid, to the persons listed on the attached service list (a copy of the service list is not being mailed with this Notice).

/s/ Robert M. Marino

Robert M. Marino